

RESPONSE TO FALP draft 2014

Secondary Modern Community Organisation, London E5
April 2014

We are a community organisation engaged in organising activities - community meals, educational workshops and recreational activities, working in partnership with local and European organisations.

In response to the amendments in the "Further Alternations to The London Plan" report from the Mayor of London, we are specifically concerned with the Mayor's new discussion of the London Legacy Development Corporation (Policy 2.4).

We are concerned with the governance of development in the LLDC (and other MDCs) areas, notably the way in which the Mayor can ensure that the exercise of his own planning authority powers are in conformity with the localism agenda and reflect the Mayor's commitments to community participation in local planning (Policy 7.1).

Our response is based on our experience and community involvement in the LLDC areas, specifically in the Chandos, Canning Town, Stratford and Hackney areas over 5 years and on our observations which we hope can contribute to give direction to the LLDC, MDCs and other development agencies. It relates directly to Policy 2.4, along with 3.5, 7.1 and 8.1 as well as a number of related policies in the Plan.

A. Our observations

We note that the Mayor's discussion of the LLDC does not cover the involvement of local communities in shaping the effective delivery of the Olympic Legacy for local communities. We feel that it is essential for communities to be involved in planning decisions if their needs are to be met. Whilst we recognise the efforts at community consultation by arms of the LLDC, in our view they have limits and have not been effective.

In this FALP (Policy 2.4 but also more generally in Policy 8.1), the Mayor should give a clear direction to the LLDC on community involvement in the LLDC and in Mayoral Development Corporations more generally in order to ensure consistency with his other policies regarding the principles of localism and bringing planning down to the local level.

It is our view that the LLDC needs to foster a more genuinely inclusive approach to community consultations; in particular this would be relevant to the cultural history of uprooted/ dislocated /unsettled communities created as a result of the Olympic Games - as for example the former Clay's Lane estate. These present ongoing problems within community work at various levels. For example many, in particular the young from either side of Leyton High Road going to Chobham Manor, have difficulty identifying with new names for neighbourhoods that don't foster collective identity.

For community workers, this creates difficulties as families would be using common communal facilities inside and outside the QE2 Park and this handicaps collective bridge-building between new and old amenities marked by great disparities. Community insights at an early stage of design can ensure that planning interventions support place-making and community building.

Community workers should not be subject to censor aspects of their community because of decisions made by ODA, LOCOG or the LLDC to exclude aspects in local social memory in their policy but we observe this is often the case.

Given the reality of funding that exists for community organisations, over 5 years (2009 to 2014), we regret there has been a revolving door of staff on short-term contracts in community work that we have liaised with.

This brings a strong sense of vulnerability within community staff especially those employed in the voluntary sector to do/say things that might be counter to LLDC policy.

In such a climate, it is very difficult to speak on behalf of anyone in a constructive way.

At times the LLDC consultation staff themselves though helpful aren't privy to the key information requested at consultations meetings which further affects faith in the consultation process and indicates there is a segregated tier of decision-making within the LLDC.

The LLDC have been extremely helpful at informing and enabling community take-up of new amenities in particular of sporting venues. School governors are delighted with help from LLDC to enable local children to access sports facilities, the Chobham Academy is now a core part of the community. The new residents at East Village we spoke to were happy with the moving in process. We compliment the LLDC on the standards of delivery of new amenities in the Legacy Park to community.

However, outside the Legacy park, too often community has been caught between the LLDC and LAs. In particular when residents complain that Borough Councils are less responsive or less open (e.g. Waltham Forest or Newham Council trying to retain Olympic parking restrictions with CPZs); monies allocated for many shop-fronts for local businesses were held up by councils silently until pressed (Waltham Forest); the inability of the LLDC to respond to questions about return of green spaces as for example with Manor Garden allotments.

The value of some consultation meetings called within communities has to be questioned. As for example, the building heights and amenities at the proposed Chobham Manor village when none of the 20 locals who attended could ever afford to live there. Whilst its good of the LLDC to inform, we have to ask to what purpose in this case.

With regards participation in the LLDC's consultation process, our assessment is that community engagement has been informal and unstructured rather than consequential. They have focussed on information sessions with the opportunity to comment, usually at the late stages of development planning process rather than community input to or co-production of plans.

We see that there are no community or voluntary sector representatives on the LLDC board, and no formal consultation structures have been set up.

Community experiences of the LOCOG and ODA period were not very positively viewed, and indicate that an independent review of past practices in the area might be helpful to ensure improvements for future MDCs.

B. Our recommendations on Communities and MDCs:

MDCs should prepare a Primer for consultations at the start (which should be consulted on) and set out involvement possibilities. Much better practice needs to inform consultations than to date; they need Structure and Preparation to be productive. Given the strategic role of MDCs in the Mayor's plans, these need to be guided by best practices, guidance and direction established by the Mayor to ensure his Development Corporations conform with his policies. The broad principles of these need to be set out in the FALP for debate, and the terms of effective community involvement defined (paragraph 3.88 for example advocates collaboration with community and voluntary sectors, but as we have shown this can be done in a way which is not always productive or beneficial).

The cultural history of communities should be protected and reflected in names. MDCs are not only about infrastructure development however much these may benefit community, they are also making places in particular historical and community contexts. Here, the Mayor's London Plan guidance provides some general guidance; how to achieve this in situations when large-scale redevelopment of an area is required. In these circumstances, community involvement is even more critical to enable community to build on and economically benefit and have a share in redevelopment which we feel will be more in keeping with the Mayor's commitments to fostering diversity and vitality with creative use of the city's heritage assets (Policy 7.8), and to the creation of Lifetime Neighbourhoods (Policy 7.1), as well as to developing neighbourhoods which build on and enhance local character (Policy 7.4). In all these matters local communities are best placed to

identify and enable such beneficial aspects of local planning and should be involved in planning discussion and design at an early stage.

It is of concern that development corporations have a monopoly on consultations. Given the scale of development, for MDCs there should be an Independent funded community-led body as an anchor point for consultations within community who can undertake the preparation of the statement of community involvement with the MDC and facilitate effective engagement. If this had been the case things in the Legacy park would be very different and in our view and the Olympic Legacy more effectively secured.

It is vital that the Mayor direct that there be representation of community and voluntary sector on LLDC and MDC boards; there is no such representative at the moment.

This raises the more general point of the governance of MDCs, which is not specified in the Localism Act Part 8 Chapter 2.

The Mayor's views on the governance of MDCs are properly a part of his wider strategic thinking and should be presented for wider public scrutiny. For example, the expectation that the London Enterprise Board have third sector representation (although this has not been implemented) indicates that the governance structures of the LLDC are out of step with wider statutory governance practices.

C. Statement of Community involvement incorporating the above

To conclude we recommend in consultation with peer organisations that the Mayor should produce a Statement of Community involvement.

This would enable the LLDC and MDCs to explain the processes that they will apply for community involvement and decision making and direct them in how to do so.

We recommend that the Statement of Community involvement, through which there is clear direction to planning bodies on best practice in community involvement, has a version approved by the Plain English Campaign with its kitemark and made available in a genuinely inclusive way to all members of community.

The Statement of Community involvement would make it clear that they should follow the same localism and engagement activities as expected of any LPA, Local Planning Authority.

A Statement of Community involvement would allow the Mayor to specify an approach to consultation, notably in relation to designating MDCs under the Localism Act (for example, Chapter 2 S 4 (h) and S219 and S 220), which is consistent with the GLA Act S32 (3).

To conclude we note the Mayor's commitment to community participation but our observations show evidence that there are selective or excluding ways of doing this, and that MDCs should receive direction through the Mayor's Statement of Community Involvement as to how to conduct community engagement effectively and impartially (which he is able to give as per the Localism Act).

This could also stand as expectations and guidance for the increased number and scale of large strategic developments in Opportunity Areas (Appendix A1.1) which are driven by the Mayor's own planning term, as well as best practice guidance for London Boroughs and other planning authorities in the GLA area.

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